

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	
)	NO. 14 B 42971
CHRISTINE VENTURA)	
)	
)	Chapter 7
Debtor.)	
)	
)	
)	Honorable Judge A. Benjamin Goldgar

NOTICE OF MOTION

TO: John E. Gierum, Chapter 7 Trustee (via ECF)
Motorola Employee Credit Union, Attn: Michael Murphy, President, 1205 E. Algonquin Road,
Schaumburg, IL 60196 (via U.S. Certified Mail)

PLEASE TAKE NOTICE that on April 17, 2015, at 1:00 PM, the undersigned will appear before the Honorable Judge A. Benjamin Goldgar at the North Branch Court located at 1792 Nicole Lane, Round Lake Beach, Illinois 60073 and will then and there present **Debtor's Motion Pursuant to 11 U.S.C. §722 for Authority to Redeem Personal Property** at which time you may appear if you so choose.

Certificate of Service

I, Charles Magerski, hereby certify that I caused a copy of this notice to be served, via ECF to John E Gierum (Chapter 7 Trustee), and via U.S. Certified Mail to Motorola Employee Credit Union, Attn: Michael Murphy, President, and attached Motion upon the above parties on March 18, 2015, before the hour of 5:00 p.m. from the office located at 900 Jorie Blvd., Ste 150, Oak Brook, IL 60523.

BY: /S/ CHARLES MAGERSKI
SULAIMAN LAW GROUP
COUNSEL FOR DEBTOR(S)
900 JORIE BOULEVARD, SUITE 150
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ATTORNEY NO: 6297092

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**DEBTOR'S MOTION PURSUANT TO 11 U.S.C. §722 FOR AUTHORITY TO REDEEM
PERSONAL PROPERTY**

NOW COMES, Christine Ventura (“Debtor”), by and through her attorneys, Sulaiman Law Group, LTD., and pursuant to 11 U.S.C. §722 and Bankruptcy Rule 6008 moving this Honorable Court for a Redemption Order on the following grounds:

1. The Debtor filed a petition for relief under Chapter 7 of the Bankruptcy Code on November 29, 2014.
2. The item to be redeemed is a tangible personal property intended primarily for personal, family or household use.
3. Specifically, the personal property is a 2008 Ford Escape.
4. The interest of the Debtor in such property is exempt or is of inconsequential value to the bankruptcy estate.
5. Furthermore, the debt which is secured by said property to the extent of the allowed secured claim of Motorola Employee Credit Union is a dischargeable debt.

6. The allowed secured claim of Motorola Employee Credit Union for purposes of redemption, the "redemption value", should be determined to be not more than \$6,102.00 as evidenced by the attached valuation. *See* attached Exhibit A is a true and accurate copy of the valuation.
7. Arrangements have been made by the Debtor to pay Motorola Employee Credit Union up to the aforesaid amount in a lump sum should this motion be granted.
8. The payment for this proposed redemption is to be paid Cashier's Check.
10. The redemption is in the best interests of the Debtor as the balance owed at the time of filing of the instant bankruptcy was approximately \$13,891.00.
11. The monthly payment on the vehicle was over \$300.00 per month.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

A. Allowing the Debtor to redeem the 2008 Ford Escape from Motorola Employee Credit Union by paying Motorola Employee Credit Union the sum of \$6,102.00 within thirty (30) days of the entry of such an Order, or within thirty (30) days of the entry of discharge, whichever occurs later, and that Motorola Employee Credit Union shall release its secured interest and/or lien, free and clear, within ten (10) days of receipt of said funds; and

B. For any and all other relief this Court deems fair and proper.

Dated: March 18, 2015

Respectfully Submitted,

/s/ Charles Magerski
Charles Magerski, Esq. #6297092
Counsel for Debtor
Sulaiman Law Group, LTD
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